

KOPELMAN & KOPELMAN LLP
A PARTNERSHIP FOR THE PRACTICE OF LAW
90 MAIN STREET, SUITE 205
HACKENSACK, NEW JERSEY 07601-7001
TELEPHONE (201) 489-5500
TELECOPIER (201) 489-7755
E-MAIL kopelaw@kopelmannj.com

MICHAEL S. KOPELMAN
MEMBER NJ AND NY BARS
CAROL WEINFLASH KOPELMAN
MEMBER NJ BAR

NEW YORK OFFICE
ONE PENN PLAZA, SUITE 2414
NEW YORK, NEW YORK 10119
(212) 629-0733

July 14, 2021

VIA ECF

Honorable John K. Sherwood, U.S.B.J.
United States Bankruptcy Court
50 Walnut Street, Courtroom 3D
Newark, NJ 07102

Re: John Patrick O'Grady, CH 7, Case No. 19-19513-JKS

Hearing Date: 7/20/2021 at 10:00 a.m.

re: Errata

Dear Judge Sherwood:

With respect to our opposition to the Trustee's Notice Of Motion To Approve Settlement (Doc 221) filed yesterday (Doc 227), please note the following inadvertent errors.

- Page 2 line 1 change "the Chapter 11 Debtor" to "the estate".
- The total appearing in objection #2 should be \$252,345.40 and not \$228,785.72.

The correct claims are:

1. **\$124,983.24** - Kopelman & Kopelman LLP - administrative claim. See amended administrative claim filed 6/11/21. (Claim 4).
2. **\$42,805.22** - Shapiro Croland - administrative claim. See Fee Application filed 12/8/20 (Doc 178). (Exclusive of \$10,000.00 retainer already paid.)
3. **\$6,765.00** - Brian W. Hofmeister - administrative claim. See Fee Application filed 12/2/20 (Doc 174).

4. **\$2,857.50** - Thomas Colitsas & Associates P.A. - administrative claim. See administrative claim filed 6/11/21 (Claim 6).
5. **\$40,959.44** - I.R.S. – Unsecured priority claim of \$17,399.76. Unsecured general claim of \$23,559.68. Total: \$40,959.44. See amended proof of claim filed 5/22/20. (Claim 2).
6. **\$8,500.00** - American Express. See Debtor's schedules filed 5/21/19. (Doc 10).
7. **\$2,500.00** - Discover Financial Services. See Debtor's schedules filed 5/21/19. (Doc 10).
8. **\$22,975.00** - Debtor's homestead exemption claim. See Debtor's schedules filed 5/21/19. (Doc 10).

Total: \$252,345.40

I also neglected to list Trustee's commission of \$9,800.00 as set forth in ¶ 3 of the settlement agreement to the list of claims set forth above. This brings the total claims to **\$262,145.40** over **double** the Trustee's estimate of **\$131,000.00**.

Thank you for your kind consideration.

Respectfully submitted,

KOPELMAN & KOPELMAN LLP

/s/ Michael S. Kopelman

Michael S. Kopelman, Esq.